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21 UNITED STATES DISTRICT COURT  
22 CENTRAL DISTRICT OF CALIFORNIA  
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25 LA ALLIANCE FOR HUMAN RIGHTS,  
et al.,

Case No. CV 20-02291 DOC (KES)

26 Plaintiffs,

JOINT STIPULATION OF CITY OF  
LOS ANGELES AND COUNTY OF  
LOS ANGELES TO EXTEND  
DEADLINE TO FILE STATUS  
REPORT

27 vs.

28 CITY OF LOS ANGELES, a Municipal  
entity, et al.,

Defendants.

JOINT STIPULATION TO EXTEND DEADLINE TO FILE STATUS REPORT  
Case No. CV 20-02291 DOC (KES)

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JOINT STIPULATION TO EXTEND DEADLINE TO FILE STATUS REPORT  
-1- Case No. CV 20-02291 DOC (KES)

1                   **TO THE COURT, ALL PARTIES, AND ATTORNEYS OF RECORD:**  
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3                   Defendants City of Los Angeles and County of Angeles (collectively,  
4                   “Defendants”), by and through their respective counsel, hereby stipulate to the following:  
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6                   **RECITALS**  
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8                   WHEREAS, on May 22, 2020, this Court issued a preliminary injunction, that  
9                   requires Defendants to offer shelter or housing alternatives to homeless residents living  
10                  within 500 feet of freeway overpasses, underpasses, and ramps, and to humanely relocate  
11                  such individuals by September 1, 2020 (“Order”) [Dkt. 123];  
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13                  WHEREAS the Order required periodic status reports from the parties as to their  
14                  progress, and directed that the first such report shall be filed with the Court no later than  
15                  12:00 noon on Friday, June 12, 2020;  
16

17                  WHEREAS, the Court requested that in this status report at minimum, Defendants  
18                  detail a plan for establishing shelter and clearing overpasses, underpasses, and ramps by  
19                  no later than September 1, 2020 [Dkt. 123];  
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21                  WHEREAS the Defendants have been diligently developing their respective plans  
22                  for establishing shelter and humanely relocating persons camping near overpasses,  
23                  underpasses, and ramps by September 1, 2020;  
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25                  WHEREAS, on May 28, 2020, Defendants filed their Joint Request of City of Los  
26                  Angeles and County of Los Angeles for Order to Mediate (“Joint Request”) [Dkt. 124];  
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28                  WHEREAS, on May 29, 2020, the Honorable David Carter issued an Order  
29                  Appointing Mediator, which granted Defendants’ Joint Request, and appointed the  
30                  Honorable André Birotte Jr. to serve as the mediator in this matter [Dkt. 125];  
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32                  WHEREAS, on May 29, 2020, the Honorable André Birotte Jr. issued an Order  
33                  Setting Briefing Schedule and Mediation for Defendants City of Los Angeles and County  
34                  of Los Angeles Pursuant to Judge Carter’s Order Appointing Mediator (“Scheduling  
35                  Order”) [Dkt. 127];  
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37                  WHEREAS, the Scheduling Order initially set the mediation for June 4, 2020, but  
38                  Defendants and the Mediator agreed to hold the mediation on Thursday, June 11, 2020 at  
39

40                   **JOINT STIPULATION TO EXTEND DEADLINE TO FILE STATUS REPORT**

1 10:00 a.m. at the County of Los Angeles' Hall of Administration located at 500 West  
2 Temple St, Los Angeles, CA 90012;

3 WHEREAS, Defendants further agreed to continue to mediate (if necessary) on  
4 Friday, June 12, 2020 at 10:00 a.m. at Los Angeles City Hall located at 200 North Spring  
5 St, Los Angeles, CA 90012;

6 WHEREAS, Defendants are entering mediation in good faith with the intent to  
7 resolve outstanding funding issues by and between them;

8 WHEREAS, any agreements reached by and between Defendants during the course  
9 of mediation could ultimately impact the plan(s) presented to the Court in the status report  
10 due on Friday, June 12, 2020 at noon; and

11 WHEREAS, the parties have met and conferred and agree they will need an  
12 additional week to draft any plans and agreements discussed in mediation and therefore  
13 seek a one week extension of time to submit the initial status report.

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JOINT STIPULATION TO EXTEND DEADLINE TO FILE STATUS REPORT  
-3- Case No. CV 20-02291 DOC (KES)

## **STIPULATION**

NOW THEREFORE, IT IS HEREBY STIPULATED that the current deadline to file an initial status report with the court on June 12, 2020 shall be extended one week to June 19, 2020.

## **IT IS SO STIPULATED.**

DATED: June 10, 2020

MARY C. WICKHAM

/s/ Lauren Black  
Lauren M. Black  
Principal Deputy County Counsel  
COUNTY OF LOS ANGELES

DATED: June 10, 2020

## CITY OF LOS ANGELES

*/s/ Scott Marcus*  
Scott Marcus  
Senior Assistant City Attorney  
CITY OF LOS ANGELES

*Filer's Attestation: Pursuant to Local Rule 5-4.3.4(a)(2)(l), Byron J. McLain hereby attests that concurrence in the filing of this document and its contents was obtained from all signatories listed above.*

JOINT STIPULATION TO EXTEND DEADLINE TO FILE STATUS REPORT  
-4- Case No. CV 20-02291 DOC (KES)